

## Office of the City Manager

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November 1, 2005

Lemuel C. Stewart, Jr., Chairman Virginia Wireless E-911 Services Board 411 E Franklin St., Suite 500 Richmond, Virginia 23219

Subject: Proposed changes to 56-484.12-17

Dear Mr. Stewart,

It has been brought to my attention that the Virginia Wireless E-911 Services Board may be asked to consider for approval as part of its 2005 Annual Report several proposed changes to Virginia Code Section 56-484. 12-17. The City of Roanoke has reviewed this proposed legislation and has concluded that these changes are not in the best interest of the City of Roanoke.

The City of Roanoke believes the focus of the Virginia E-911 Wireless Board should be completing any remaining E-911 wireless deployment in the State. In doing so this would complete the purpose for which the board was created.

The City of Roanoke does not at this time support the authority of the Board to include voice over-internet protocol (VoIP) funding. Funding from the VoIP provider is a concern and it is unclear what role the Board should have in the matter. There is no clear indication from the Board that would require VoIP carriers to collect the local wireline surcharge, currently \$2.00 in the City of Roanoke or the State required \$.75 wireless surcharge.

Funding from the Wireless Board to establish a State IP-based network is beyond the scope and charter of the Wireless Board. There are other agencies within the State better equipped to oversee the development and funding of such a network.

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Best practices related to a PSAP are available from a number of professional organizations and it is unclear as to the need or benefit that would come from establishing "best practices" and expanding the role of the Wireless Board to define such.

The current funding structure should not be changed to the proposed funding plan. It would be best to defer until such time as the funding structure and any changes and their impacts are fully understood.

In conclusion I respectfully request that the Wireless Board refrain from including these proposed legislative changes as part of its 2005 Annual Report.

Sincerely,

Darlene L. Burcham

City Manage

DLB:mc